



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMM:SK  
F. #2013R00948

*610 Federal Plaza  
Central Islip, New York 11722*

April 6, 2015

**By Email & ECF**

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Re: United States v. Philip Kenner & Tommy C. Constantine  
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014, September 12, 2014, September 19, 2014, October 2, 2014, February 20, 2015, February 25, 2015, February 28, 2015, March 3, 2015, March 5, 2015 and March 17, 2015.

Enclosed please find records obtained from Citizens Bank (BNK-CTZN 1-5), Fidelity Investments (BNK-FIMS 1-10), HL Group (HL 40-42), and individuals (ED 3248-3252).

In addition, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the United States hereby notifies you that it intends to call

Special Agent Robert J. Meshinsky of the Federal Bureau of Investigation as an expert witness in the above-referenced matter. Special Agent Meshinsky is expected to testify about his seizure and imaging of the electronic devices recovered from defendant Kenner's home in Scottsdale, Arizona on November 13, 2013. A copy of Special Agent Meshinsky's curriculum vitae is enclosed as 3500-RJM-1.

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/Saritha Komatireddy  
Saritha Komatireddy  
James M. Miskiewicz  
Assistant U.S. Attorneys  
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)